



February 23, 2012  
**Via ECFS Filing**

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

RE: Greenway Communications LLC  
EB Docket No. 06-36; 2011

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Greenway Communications LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant to Greenway Communications LLC

cc: Stacy Snyder, Greenway  
file: Greenway - FCC - Other  
tms: FCx1201

Enclosures  
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification	Covering calendar year 2011
Name of company(s) covered by this certification:	Greenway Communications LLC
Form 499 Filer ID:	827801
Name of signatory:	Chad Potts
Title of signatory:	Chief Technology Officer

1. I, Chad Potts, certify that I am the Chief Technology Officer of Greenway Communications LLC, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Chad Potts, Chief Technology Officer

2/20/12  
\_\_\_\_\_  
Date

**Attachments:**      Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **Greenway Communications LLC**

### **Annual CPNI Compliance Certificate-Summary of Operating Procedures**

Greenway Communications, LLC has established operating procedures that are adequate to ensure its compliance with the rule in Title 47 – Telecommunications, sections 64.2001 *et seq.*

1. Greenway Communications, LLC has established a system by which the status of a customer's approval for use of CPNI can be clearly established prior to the use of CPNI. Greenway Communications, LLC relies on the involvement of its high level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
2. Greenway Communications, LLC trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use or release CPNI. However, Greenway Communications, LLC's personnel make no decisions regarding CPNI without first consulting with the Chief Technology Officer. Greenway Communications, LLC has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
3. Greenway Communications, LLC has a policy for addressing customer requests for access to their own CPNI.
4. Greenway Communications, LLC's policy is to maintain records of its own sales and marketing campaigns that use CPNI. Greenway Communications, LLC also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. Greenway Communications, LLC maintains these records in its offices for a minimum of one year.
5. Greenway Communications, LLC has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of the supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Greenway Communications, LLC personnel, prior to making any use of CPNI, must first consult with the Chief Technology Officer or the Office Manager regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, the Chief Technology Officer consults one or more of the following: Greenway Communications, LLC's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. Greenway Communications, LLC's sales personnel must obtain supervisory approval from the Chief Technology Officer regarding any proposed use of CPNI.
6. Further, Chief Technology Officer personally oversees the use of opt-in or other approval requirements contained in the FCC's regulations. The Chief Technology Officer also reviews all notices required by the FCC regulations for compliance therewith.
7. The Chief Technology Officer also ensures that Greenway Communications, LLC enters into appropriate confidentiality agreements, as necessary, if it discloses or provides access to CPNI for any purpose.

8. Greenway Communications, LLC's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. Greenway Communications, LLC maintains records of customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.
9. Greenway Communications, LLC has procedures in place for notifying applicable law enforcement personnel and customers, as permitted, after discovery of a breach of a customer's CPNI. Greenway Communications, LLC will maintain a record of all breaches discovered, notifications made to law enforcement and customers, and to the extent possible, dates of discovery and notification of the breach, a description of the CPNI that was subject to the breach, and the circumstances of the breach, for a minimum of two years.
10. Greenway Communications, LLC has not taken any actions against data brokers in the last year.
11. Greenway Communications, LLC did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2011.
12. Greenway Communications, LLC has not developed any information with respect to the processes pretexters are using to attempt to access CPNI. If Greenway Communications, LLC suspects that a pre-texter may be attempting to gain access to CPNI, it will immediately ask the requester to provide information that only the customer would be able to provide and would further investigate suspected pre-texting activity.